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**FEDERAL MARITIME COMMISSION**

**WASHINGTON, D.C.**

**DOCKET NO. 15-11**

**IGOR OVCHINNIKOV, ET AL**

**v.**

**MICHAEL HITRINOV, ET AL**

**Consolidated With**

**DOCKET NO 1953(I)**

**KAIRAT NURGAZINOV, ET AL**

**v**

**MICHAEL HITRINOV, ET AL**

**FILED**

**JUN 27 2016**

**Federal Maritime Commission  
Office of the Secretary**

**RESPONDENTS' MOTION FOR EXTENSION OF TIME**

Pursuant to FMC Rules 69 and 71, Respondents Empire United Lines and Michael Hitrinov hereby move for an extension until July 15, 2016 to respond to Complainants' Response to Respondents' Motion for Judgment on the Pleadings. The reason for this request is that Counsel for Respondents is currently out of the country through July 5, 2016. This fact was noted in Respondents' Proposed Schedule, as well as in Respondents' Motion for Extension of Time filed on June 21, 2016.

The undersigned respectfully requests that in light of the current due date for Respondents' reply to the foregoing response, there be a prompt conference in lieu of a written response by Complainants. As previously explained, Respondents' are effectively without counsel while the undersigned is out of the country.

For the foregoing reasons, Respondents respectfully request that the foregoing motion for extension of time be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Eric Jeffrey", written over a horizontal line.

Eric Jeffrey  
Anjali Vohra

**Nixon Peabody LLP**  
799 9<sup>th</sup> Street, N W , Suite 500  
Washington, D C 20001  
(202) 585-8000

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing Motion for Extension of Time by email and first class mail to the following

Marcus A. Nussbaum, Esq  
P O Box 245599  
Brooklyn, NY 11224  
Marcus.nussbaum@gmail.com

Seth M. Katz, Esq  
P O Box 245599  
Brooklyn, NY 11224

Dated at Washington, DC, this 27<sup>th</sup> day of June, 2016

  
Anjali Vohra  
Counsel for Respondents



RECEIVED  
2016 JUL -6 PM 4:22  
OFFICE OF THE SECRETARY  
FEDERAL MARITIME COMMISSION

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June 27, 2016

**VIA EMAIL AND FIRST CLASS MAIL**

The Hon Karen V Gregory  
Secretary of Federal Maritime Commission  
800 North Capitol St.  
Room 1046  
Washington, D C 20573

Re Docket No. 15-11 – Ovchinnikov v. Hitrinov

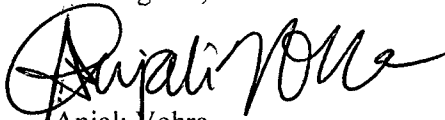
Dear Ms Gregory:

Enclosed for filing in the above-captioned matter are an original true copy and five (5) additional copies of:

1 Respondents' Motion for Extension of Time

Please contact me if you have any questions.

Best regards,

  
Anjali Vohra

Enclosures